



The role of data ethics in complying with the GDPR

Privacy statement

For this survey, we will publish all responses received from organisations but we will remove any personal data before publication. We will not publish responses received from respondents who have indicated that they are an individual acting in a private capacity (eg a member of the public). For more information about what we do with personal data see our privacy notice.

Existing practice

- Q1 Does your organisation currently use an existing, publicly-available ethical framework in its decision-making processes?
- 7 Yes
- 21 No
- Q2 If yes, please provide a link to that framework below, **then please go to Q6.**
- 7
- Q3 If no, does your organisation plan to adopt any such publicly-available ethical framework?
- 2 Yes
- 9 No **please go to Q5.**
- 11 Unsure /don't know **please go to Q5.**

- Q4 If yes, when do you anticipate this adoption taking place within? **then please go to Q6.**
- 0 3 months
 - 1 6 months
 - 1 12 months
 - 0 >12 months
- Q5 Alternatively, is your organisation either developing or planning to develop its own bespoke ethical framework?
- 13 Yes
 - 6 No **please go to Q11**
 - 3 Unsure/don't know **please go to Q11**
- Q6 Why did you choose that particular framework? [Tick all that apply]
- 5 Comprehensive
 - 9 Clear
 - 10 Best fit for purpose
 - 3 Best in class
 - 7 Other
 - 3 Unsure/don't know
- Q7 What were (or what do you perceive will be) the three largest obstacles to building the framework into your organisation's decision-making processes effectively? [Tick all that apply]
- 10 Unclear how to integrate ethical principles into processes
 - 9 Organisational cultural resistance/inertia
 - 4 Benefit proposition not clearly articulated or communicated
 - 6 No responsible person nominated
 - 7 Other
 - 3 Unsure/don't know
- Q8 Are (or will) the framework's considerations be integrated into your data protection impact assessment or legitimate interest assessment, or are they undertaken as part of a separate process?
- 10 Integrated
 - 4 Separate
 - 6 Unsure/don't know

Organisation

Q9 Does your organisation have someone formally responsible for 'data ethics'?

13 Yes

8 No

1 Unsure/don't know

Q10 If yes, what is this person's title, how senior are they and where within your organisation does their role sit? **then please go to Q13.**

Please use less than 1000 characters count

15

Q11 If no/unsure/don't know, are ethical considerations nevertheless raised informally by colleagues not expressly responsible for data ethics?

17 Yes

1 No **please go to Q15**

2 Unsure/don't know **please go to Q15**

Q12 If yes, are these ad-hoc issues raised appropriately and dealt with in a constructive manner?

15 Yes

1 No

3 Unsure/don't know **please go to Q21**

Q13 Does your organisation have a Data Ethics Board?

5 Yes

20 No

1 Unsure/don't know **please go to Q21**

Q14 If yes, describe briefly who sits on it, what their disciplines are, how frequently it meets, how senior its members are and whether they are internal/external to your organisation, **then please go to Q17.**

Please use less than 1000 characters count

7

Q15 If no, is your organisation considering establishing a Board?

3 Yes

7 No **please go to Q21**

9 Unsure/don't know **please go to Q21**

Q16 If yes, when do you anticipate this taking place within?

- 1 3 months
- 1 6 months
- 1 12 months
- 1 >12 months

Q17 Does or will your organisation's Data Ethics Board have decision-making power or is it, or will it be, only consultative?

- 5 Decision-making
- 2 Consultative
- 0 Neither
- 5 Unsure/don't know **please go to Q21**

Q18 If you answered: Decision-making

Has the Board declined business proposals or asked them to be re-formulated?

- 4 Yes
- 1 No
- 0 Unsure/don't know

Q19 If you answered: Consultative

How is its impact measured? Please use less than 1000 characters count

3

Q20 If you answered: Neither

Please explain. Please use less than 1000 characters count

0

Q21 Does your organisation have a data protection officer (DPO)?

- 24 Yes
- 3 No
- 0 Unsure/don't know **please go to Q25**

Q22 If yes, is it mandatory for your organisation or have you appointed someone voluntarily?

- 20 Mandatory
- 4 Voluntary
- 2 Unsure/don't know

Q23 If no, are you considering appointing a DPO voluntarily?

1 Yes

2 No **please go to Q25**

0 Unsure/don't know **please go to Q25**

Q24 If yes, when do you anticipate this taking place?

0 3 months

0 6 months

1 12 months

0 >12 months

Ethical Decision Making

Q25 Does your organisation always take the same factors into account when assessing Art.5(1)(a) 'fairness'?

9 Yes

14 No

4 Unsure/don't know **please go to Q30**

Q26 If yes, what are those factors?

Please explain. Please use less than 1000 characters count

9

Q27 If no, is this because there is no formalised structure around how to consider 'fairness', or because context is taken into account?

7 No formal structure

8 Context specific

Q28 If no formal structure, list the considerations most frequently discussed when assessing 'fairness'

Please use less than 1000 characters count

6

Q29 If context-specific, what is the process for choosing the correct 'fairness' criteria for any given set of circumstances?

Please use less than 1000 characters count

7

Q30 How do you record the factors taken into account when assessing whether a data controller's legitimate interest is overridden by data subjects' interests or fundamental rights and freedoms when relying on Art.6(1)(f)?

Please use less than 1000 characters count

21

Q31 Do you think ethical considerations should be taken into account when relying on Art.6(1)(f) to justify your processing as a data controller?

23 Yes

2 No

2 Unsure/don't know **please go to Q34**

Q32 If yes, what are the three most important ethical factors to your organisation?

Please use less than 1000 characters count

20

Q33 If no, why not?

Please use less than 1000 characters count

2

Compliance programmes

Q34 If your organisation has adopted explicitly ethical considerations, are these built into your training materials?

13 Yes

5 No

3 Unsure/don't know **please go to Q38**

7 No such adoption **please go to Q38**

- Q35 If yes, are these training materials the same as, or delivered alongside, data protection training content?
- 11 Yes
 - 2 No
- Q36 If no, are you planning to create such training materials
- 6 Yes
 - 2 No
- Q37 If yes, when do you anticipate this taking place within?
- 0 3 months
 - 2 6 months
 - 2 12 months
 - 2 >12 months
- Q38 When selecting a third-party processor, do you assess whether they have an ethics based programme?
- 3 Yes
 - 17 No **please go to Q40**
 - 8 Unsure/don't know **please go to Q40**
- Q39 If yes, do you have examples of the existence or robustness of any such programme putting the potential service provider in a preferred position?
- 2 Yes
 - 1 No
 - 0 Unsure/don't know

About you

This section is optional – telling us who you are will help us to understand your needs more clearly as we design our guidance products, but you may answer the survey anonymously should you wish.

Q40 Your name:

13

Q41 Work email address:

12

Q42 Who are you answering as? Please select as appropriate:

--Click Here--	
As a member of the public	4
On behalf of an organisation (please specify)	18
On behalf of a sector or group (please specify)	0

If you are a member of the public please move to the end of the survey.

Q43 If you answered, On behalf of an organisation or Sector group, please specify below:
15

Q44 What is your role in your organisation?

--Click Here--	
Data Protection Officer	8
Information Security Officer	0
Data Protection Adviser	4
Ethics Adviser	2
Legal Adviser	0
Other (please specify)	7

Q45 If other, please specify below:
8

Q46 What sector do you work in?

--Click Here--	
Public	5
Private	16
Third/Charity/Voluntary	1
Combination of the above (please specify)	1

Q47 If you answered, a combination of the above then please specify below:
Please use less than 1000 characters count
3

Thank you for completing the survey.

To submit your responses please click below